

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 05-10218-RCL
)	
JESSE WILSON)	
)	
)	

ASSENTED-TO MOTION TO EXCLUDE TIME
FROM SEPTEMBER 7, 2005 THROUGH SEPTEMBER 21, 2005

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, and Assistant U.S. Attorney Mark J. Balthazard, hereby moves, with the oral assent of defense counsel, Paul Garrity, that this Court enter an Order excluding the period of time between and including September 7, 2005 and September 21, 2005, from the computation of the time within which a trial must be held in this matter pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(c).

The defendant's initial appearance took place on September 7, 2005. At that time, the government moved for detention. At the request of the defendant, the arraignment and detention hearing was continued to September 21, 2005. The parties agree that the period of time between the initial appearance and the date on which the detention hearing is now scheduled, September 21, 2005, should be excluded from the computation of time within which a trial must be held. Given that the continuance was at the request of the defendant, excluding this time period serves the ends of justice.

Accordingly, the parties request that this Court enter an Order excluding the time period set forth above from the computation of the time within which a trial must be held in this matter under 18 U.S.C. § 3161(c).

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

/s/ Mark J. Balthazard
MARK J. BALTHAZARD
Assistant U.S. Attorney

So Ordered, this _____ day of _____, 2005

MARIANNE B. BOWLER
United States Magistrate Judge